



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

1200 Sixth Avenue, Suite 155  
Seattle, WA 98101-3123

SUPERFUND &  
EMERGENCY  
MANAGEMENT DIVISION

**MEMORANDUM**

**SUBJECT:** EPA Comments, Bradford Island Stormwater and Catch Basin Solids Data Report

**FROM:** Helen Bottcher

**TO:** Chris Budai and Dan Carlson, USACE Portland District

**DATE:** February 11, 2022

**Document Reviewed:**

*Draft Stormwater and Catch Basin Solids Data Report and Best Management Practices Evaluation, Sandblast AOPC, Bradford Island, Cascade Locks, Oregon. Prepared by U.S. Army Corps of Engineers, Portland and Seattle Districts. Dated January 11, 2022*

**General Comments**

It will be helpful combine the stormwater data with soil data and other information about known contaminant sources in the Revised FS for the Upland OU. Without the context of the soil data, it is difficult to draw conclusions from this report, other than to note that copper, PAHs, and PCBs continue to be contaminants of concern, even with filter socks to reduce solids in the stormwater. This data report will provide a nice baseline against which to compare post-remedial sampling data.

**Specific Comments**

**List of Acronyms.** Typo. TOV total organic carbon should be TOC total organic carbon

**Section 2.1, page 3.** The report cites a conclusion from a 2009 URS report that stormwater that flows from the former sandblast building area to the northeast infiltrates into vegetated areas before reaching the Columbia River. Has this conclusion been confirmed since 2009, perhaps during a wet weather inspection? If yes, this should be described.

**Figure 2.** It would be helpful if the approximate catchment areas around each of the catch basins could be shown on this or another figure.

**Section 7.1 Riverine Modeling.** Is the HVAC system a significant contributor to the total discharge through OF-2? That seems unlikely, so I am assuming I don't understand the different discharge scenarios. Please describe them more fully and/or provide a table with the discharge rates for each scenario. Also, please clarify -- did the models assume a receiving water concentration of zero, or were Columbia River background concentrations used in the calculations?

**Section 8, Conclusions and BMP Recommendations.** USACE may want to implement additional housekeeping measures to improve stormwater quality. Regular sweeping of parking lots can reduce brake dust in stormwater for example, and brake dust is a significant source of copper. Moving

galvanized metal equipment indoors or covering it can reduce zinc concentrations in stormwater. Good housekeeping can reduce the need for frequent filter sock changes and extend the period between catch basin solids cleanout events.

**Appendix A, Modeling** states that the HVAC discharge is estimated to be 40 gal/minute. That is a lot of water. A garden hose discharges 10 to 15 gallons a minute. Does the HVAC system discharge three to four garden hoses of water, continuously? If yes, the HVAC system should be described, as this is an unusually high discharge rate.